

San Francisco Bay Conservation and Development Commission

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State of California | Gavin Newsom – Governor | info@bcdc.ca.gov | www.bcdc.ca.gov

November 6, 2019

Dr. Mark Gold, Director
California Ocean Protection Council
1416 Ninth Street, 13th Floor
Sacramento, CA 95814

Dear Director Gold:

Please accept this letter as my response to the Ocean Protection Council's proposed Strategic Plan. Unfortunately, the full San Francisco Bay Conservation and Development Commission will not have the opportunity to discuss your draft proposal prior to the OPC's discussion on November 13, 2019. Therefore, my comments below do not represent those of BCDC, *per se*, but are my own.

In your presentation to the biennial State of the Estuary Conference in Oakland last month, you proposed that the OPC develop a goal that would encourage coastal and shoreline developments to be resilient to five feet of rising sea level by 2050. I note that the public document now being considered essentially confirms the State's existing guidance, which is more or less 3.5 feet.

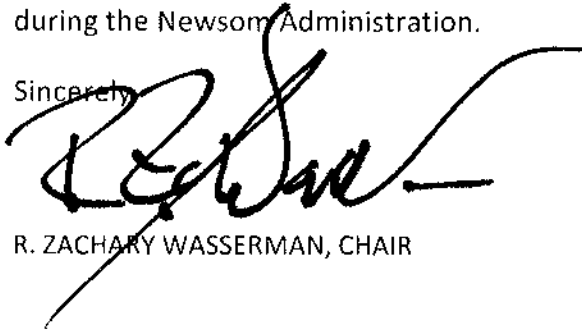
Candidly, I think that the OPC should include the five-foot figure as a goal for coastal and shoreline development. While this would be a courageous approach because it is both different and higher than existing interpretations of the State's guidance, I believe that there are reasonable public policy arguments in its favor. Those arguments include:

1. An OPC goal of five feet of resilience would not be considered a State policy, but just what it says – a non-mandatory goal. Most important, it would jumpstart a necessary discussion about whether the scientific consensus upon which the State guidance is based is too conservative given the rate of change in rising sea level projections during the past decade.
2. Such a discussion should differentiate between adopting the best available science (*i.e.*, the existing guidance) and adopting a public policy agenda that gets ahead of the science. Scientists are trained to be conservative in their estimations for good reasons. However, I question whether policy makers can afford to be as conservative if we want to save lives, physical assets, and habitat. Just as the State did not forecast the intensity and scale of the fires that we have experienced during the past couple of years, I believe that the State and its partners should be better prepared as 2050 approaches.

3. A second major benefit of adopting the five-foot level as a goal would be to accelerate the actions and plans now in place to provide more resilience moving forward. To be clear, such acceleration would require our Administration to work even more closely with public, private, and nonprofit organizations to coordinate, collaborate, and partner as we develop and execute resilience policies.

I hope that this recommendation is not viewed as a criticism of the draft policy document but, instead, as a way to encourage the OPC to continue to take a leadership role as our coastal zone management agencies develop resilience policies along the coast and shoreline. Please be assured that I, and my colleagues on BCDC, look forward to such advice, support, and guidance during the Newsom Administration.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Wasserman', with a long horizontal stroke extending to the right.

R. ZACHARY WASSERMAN, CHAIR

cc: Secretary Wade Crowfoot, California Natural Resources Agency
Commissioners, San Francisco Bay Conservation and Development Commission